

### **REMARKS/ARGUMENTS**

These remarks are made in response to the Office Action of April 20, 2007 (Office Action). As this response is timely filed within the 3-month shortened statutory period, no fee is believed due. However, the Examiner is expressly authorized to charge any deficiencies to Deposit Account No. 50-0951.

### **Specification**

The Specification was objected to, due to certain informalities. Appropriate correction has been made.

### **Claims Rejections – 35 USC § 102**

Claims 1-19 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Published Patent Application No. 2004/0003041 to Moore, *et al.* (hereinafter Moore).

### **Aspects of Applicants Invention**

Although Applicants respectfully disagree with the claim rejections, Applicants have nevertheless amended the claims to emphasize certain aspects of the claimed invention and to expedite prosecution of the present application. Specifically, Applicants have amended independent Claims 1, 8, and 18 to further emphasize certain aspects of the claimed invention. It is specifically noted, however, that the amendments should not be interpreted as the surrender of any subject matter. Applicants expressly reserve the right to present the original version of any of the amended claims in any future divisional or continuation applications from the present application.

It may be helpful to reiterate certain aspects of Applicants' invention prior to addressing the cited references. One embodiment of the invention, as typified by

amended Claim 1, is a method for enabling phone users to participate in an instant messaging based conference.

The method can include receiving a speech input from a telephone through a conventional teleconferencing system; transcribing the speech input to a first text message; and transmitting the first text message to a plurality of devices coupled to an instant messaging network belonging to the instant messaging based conference. The method also can include receiving a second text message from any one among the plurality of devices on the instant messaging based conference; converting the second text message to a speech output; and transmitting the speech output to the telephone via the conventional teleconferencing system.

**The Claims Define Over The Prior Art**

One aspect of the present invention is that phone users who do not have Internet network access can nevertheless participate in an instant messaging (IM) conference. In particular, according to this aspect of the invention, a conventional teleconferencing system can be connected with an IM system thus enabling conventional phone users to participate in an instant messaging based conference. (See, e.g., Specification, paragraph [0014]; see also FIG. 1.)

In contrast, with Moore, the telephone is either an IP telephone 92 or a conventional telephone 62 connected through a VoIP gateway 54 in order to participate in the messaging communications. (See Moore, Fig. 1.) No conventional teleconferencing system is provided in the system of Moore. More fundamentally, Moore provides no teaching as to enabling conventional phone users to participate in an instant messaging based conference.

It is stated in the Office action that the intelligent chat gateway 52 manages messaging communications among a plurality of parties and can provide services,

including video conference establishing, and is thus equivalent to "a teleconferencing system." It is respectfully noted, however, that video conference establishment is not traditionally offered by telephony service providers (see [0087] of Moore) and the intelligent chat gateway 52 is thus not equivalent to a conventional teleconferencing system

Accordingly, it is believed that independent Claims 1, 8, and 18 are patentable over Moore. Moreover, since each of the dependent Claims is dependent on Claim 1, 8, or 18, they are believed to be patentable as well. Applicants thus respectfully request that the claims rejections under 35 U.S.C. § 102 be withdrawn.

### **CONCLUSION**

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

AKERMAN SENTERFITT

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Gregory A. Nelson, Registration No. 30,577  
Richard A. Hinson, Registration No. 47,652  
Yonghong Chen, Registration No. 56,150  
Customer No. 40987  
Post Office Box 3188  
West Palm Beach, FL 33402-3188  
Telephone: (561) 653-5000